

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Civil Action No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**JOINT STIPULATION REGARDING
CLASS CERTIFICATION BRIEFING DEADLINES**

Lead Plaintiffs Plymouth County Retirement Association (“Plymouth County”) and the Trustees of the Teamsters Union No. 142 Pension Fund (“Teamsters 142”) (collectively, “Lead Plaintiffs”) and Defendants Apache Corporation (“Apache”), John J. Christmann, IV, Timothy J. Sullivan, and Stephen J. Riney (collectively, “Defendants” and, together with Lead Plaintiffs, the “Parties”) stipulate and agree as follows:

1. WHEREAS, on September 15, 2021, Judge Hanks referred all non-dispositive and dispositive pretrial matters in this case to Magistrate Judge Edison (Dkt. 42).
2. WHEREAS, on December 19, 2022, the Court, Judge Edison presiding, issued a Docket Control Order (“DCO,” Dkt. 86) setting the Parties’ pre-trial briefing schedule.
3. WHEREAS, pursuant to the DCO, Lead Plaintiffs filed their Motion for Class Certification on April 7, 2023.
4. WHEREAS, under the DCO, the deadline for Defendants’ Opposition to Class Certification is currently May 19, 2023; the deadline for Lead Plaintiffs’ Reply in Support of Class Certification is currently July 7, 2023; and the deadline for Defendants’ Sur-Reply in Opposition to Class Certification is currently August 4, 2023.

5. WHEREAS, the Parties wish to extend the deadline for Defendants' Opposition to Class Certification by three weeks, to June 9, 2023, to allow for the orderly completion of certain outstanding discovery related to Defendants' Opposition to Class Certification, specifically, depositions already noticed and written discovery already served.

6. WHEREAS, the Parties also wish to extend the subsequent class certification briefing deadlines in the DCO by a corresponding three-week period.

7. WHEREAS, granting the relief requested herein will not affect any deadlines in the DCO other than those pertaining to Class Certification briefing.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their undersigned counsel, as follows:

8. Defendants will file their Opposition to Class Certification by June 9, 2023.

9. Lead Plaintiffs will file their Reply in Support of Class Certification by July 28, 2023.

10. Defendants will file their Sur-Reply in Opposition to Class Certification by August 25, 2023.

IT IS SO STIPULATED.

Dated: May 9, 2023

Respectfully submitted,

BAKER BOTTS L.L.P.

/s/ David D. Sterling

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Co-Lead Counsel for Lead Plaintiffs

IT IS SO ORDERED.

Dated: _____, 2023

Hon. Andrew M. Edison
United States Magistrate Judge